

12-22-2014

Concerns Address the Revised Discharge Monitoring Reports (DMR) for  
Platforms Elly, Ellen, and Eureka under the General Permit No. CAG280000  
Received on 12.15.2014

**General Questions, Comments, and Concerns**

1. On the DMR, the permit number, CAG280000, is still truncated.
  - a. **All Platforms**

(002) Produced Water

1. Section II.B.3, page 17 of the permit, describes the requirement for monitoring and reporting commingled waste streams with produced water. "Commingled" shall be reported on the DMR for both produced water and the waste stream mixed with it. The DMR has the comment, "Elly-only platform currently capable of discharging Produced Water for Beta Offshore." This comment should be removed and replaced with the following comments:
  - a. **Ellen:** "WTCWF, Deck Drainage, Domestic Waste, and Fire Control Water are commingled with Produced Water, and processed at platform Elly before being injected or discharged. No produced water discharged at platform Ellen.
2. Since Zinc monitoring is now required only annually and has no limit, the parameter "Zinc, total recoverable" should be removed from the monthly DMR page and added to the Annual Constituent page with the limits removed. Additionally the comment "Values listed in the DMR for zinc are post dilution (including the limits)." should be edited to remove the wording "(including the limits)." Refer to Appendix B Table B-4, page 47 of the permit.
  - a. **Elly**

(003) Well Treatment, Completion, and Workover Fluids

***The WTCF comments below may have been intentionally left out due to space constraints?***

1. The comment "Once every occurrence = Once per job," should be added to match the standard established in the meeting on 10.15.2014.
  - a. **All platforms**
2. Section II.B.3, page 17 of the permit, describes the requirement for monitoring and reporting commingled waste streams with produced water. "Commingled" shall be reported on the DMR for both produced water and the waste stream mixed with it. The

following comment should be added to the WTCWF comment section: " Well Treatment, Completion, and Workover Fluids are commingled with Produced Water."

**a. Ellen and Eureka:**

(005) Sanitary and Domestic Waste

1. A comment is needed to describe the specific discharge activities/criteria at each platform.
  - a. At the end of the comment "Domestic waste, such as laundry, is commingled with Sanitary Waste; ***all other Domestic Waste is sent to a disposal well,***" should be added.
  - b. Eureka**
2. The " Sanitary Waste, Solids" parameter should be changed to Receiving Water instead of Effluent Gross
  - a. All platforms**

(008) Fire Control System Water

1. The total chlorine residual parameter needs to be removed or a comment added that states "There is no permit requirement for chlorine monitoring." Refer to Appendix C Table C-2, page 53 of the permit, and Section II.F.4, page 24 of the permit.
  - a. All platforms**

(009) Non-Contact Cooling Water

1. The DMR has the comment "Upon initiation of chlorination, collect monthly samples for 12 months & submit RP analysis." This comment should be removed. Refer to Appendix C Table C-1, page 52 of the permit.
  - a. Elly**

(014) Diatomaceous Earth Filter Media

For Floating Solids and Foam: Remove the parameter to "Floating solids, waste or visible foam - Visual. (DMR code 45613)

**a. All platforms**